



The Chemical Company

*EPA COPY
Pat Morrow*

RCAP-RECEIVED

FEB 08 2011

Federal Express
7966 6559 8664

RECEIVED

January 18, 2011

JAN 19 2011

**Hazardous Waste Program
MO Dept. of Natural Resources**

Mr. Richard Nussbaum
Permits Section Chief
Hazardous Waste Program
Missouri Department of Natural Resources
1730 East Elm Street
Jefferson City, MO 65101

Dear Mr. Nussbaum:

This is to notify the Department that a release of treated aqueous wastewater and scrubber liquid from one of the BASF Hannibal Plant's hazardous waste incinerators occurred at the Hannibal Site on Friday, January 14, 2011. The release was partially contained, but approximately 200 gallons (1668 pounds) of wastewater and scrubber liquor were released outside of containment, accumulating in a nearby ditch. This aqueous material derives from the treatment of listed hazardous waste, making this is a reportable release. This written submittal is for MDNR Incident No. 110114-0432-ADC verbally reported to the MDNR Environmental Emergency Response Center the morning of the incident.

The release of the material was caused by a leak at an expansion joint between "D" incinerator's venturi scrubber tank and entrainment separator. The leak was to containment, but approximately 200 gallons overflowed the contained area, reaching a storm drain which discharged to a nearby ditch. Upon discovery of the leak, operations immediately stopped feeding waste to the incinerator. Gate valves sealing off the ditch were also closed to prevent migration of the ditchwater beyond plant property. The released liquid in the containment area was returned to the wastewater treatment system, and the ditchwater is being pumped to the wastewater treatment system as well.

While the released treated wastewater and scrubber liquid mostly consisted of water with a small amount of salts, the release amount exceeded the Reportable Quantity for material derived from the treatment of Listed Hazardous Waste – (100 lbs RQ in this instance). Samples taken of the ditchwater show no detectable organics. At the request of Mr. Mike Heaton, MDNR NERO, the ditchwater will be sampled and checked against NPDES permit limits to assure all regulated concentrations are within the NPDES limits prior to re-opening the ditch gate valves. A follow-up report listing the analytical results will be submitted.

BASF Corporation
Hannibal Site
3150 Highway JJ
Palmyra, MO 63461
Tel: (573) 769-8500

512012



RCRA

Helping Make Products Better®



The Chemical Company

January 18, 2011

Page 2

The expansion joint that leaked on the incinerator will be replaced. An incident investigation into the cause of the leak, and corrective measures to minimize the likelihood of recurrence are pending.

If you have any questions with regard to this submittal or require any additional information, please contact me at (573) 769-8684.

Sincerely,

BASF Corporation
Hannibal Site

A handwritten signature in cursive script, reading "Curt Gardner".

Curt Gardner
Senior EHS Specialist

cc: Mr Mike Dandurand, MDNR
Ms. Kathy Flippin, MDNR
Ms. Irene Crawford, Director, MDNR NERO
Dr. Mike McFarlane